

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
IP-Enabled Services	)	WC Docket No. 04-36
E911 Requirements for IP-Enabled	)	WC Docket No. 05-196
Service Providers	)	

**LIBERTY CABLEVISION OF PUERTO RICO, LTD.  
MOTION TO ACCEPT LATE-FILED  
SUBSCRIBER NOTIFICATION REPORT**

Liberty Cablevision of Puerto Rico, Ltd. ("Liberty Cablevision") files this Motion to accept its late-filed Subscriber Notification Report under 47 CFR § 1.205.

1. Liberty Cablevision is one of three cable companies providing cable services on the island of Puerto Rico. Liberty Cablevision provides its subscribers with advanced services including digital cable, high-speed Internet and VoIP. Liberty Cablevision's service area is limited to Puerto Rico.
2. On July 26, 2005, the Enforcement Bureau issued a Public Notice in these dockets ("Notice") that provided that an interconnected VoIP service provider could receive a 30-day extension of time in which to obtain customer acknowledgements regarding the limitations on the provider's E911 service by filing a subscriber notification report with the Bureau by August 10, 2005.
3. At the time that the Enforcement Bureau released the Notice, Liberty Cablevision was already diligently preparing to distribute warning stickers and customer acknowledgment forms in accordance with 47 CFR § 9.5. For reasons outside of the company's control, it was unable to complete the distribution project timely.

Liberty Cablevision filed the report today, along with an updated Subscriber Notification Report. The filing confirmation is attached as Exhibit 1.

4. 47 CFR § 1.205 provides:

Continuances of any proceeding or hearing and extensions of time for making any filing or performing any act required or allowed to be done within a specified time may be granted by the Commission or the presiding officer upon motion for good cause shown, unless the time for performance or filing is limited by statute.

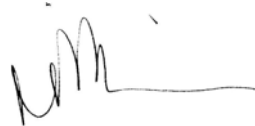
5. Good cause exists in this case. Accepting Liberty Cablevision's report is in the public interest, as the report will provide the Bureau with a more complete and accurate record of the status of compliance with the Commission's E911 rules for interconnected VoIP providers. See, e.g., *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Report and Order*, 18 FCC Rcd. 14,014 (2003) at ¶ 220. See also, *In the Matter of Bell Atlantic Progress Report on Compliance with Bell Atlantic/NYNEX Merger Order Conditions, Order*, 14 FCC Rcd. 4403 (1999) at ¶ 6.
6. Further, the August 10, 2005 deadline is not required by any statute, accordingly, the Commission has the authority to grant the requested extension.
7. Finally, accepting Liberty Cablevision's report will not prejudice any person, especially considering that Liberty Cablevision has already notified 100% of its voice customers of the limitations on its E911 services, and will distribute a second advisory, warning stickers, and customer acknowledgment forms in less than a week.
8. In order to provide a full and complete record in this docket, and because no

person will be prejudiced by acceptance of Liberty Cablevision's report, Liberty Cablevision respectfully requests that the Enforcement Bureau accept its late-filed report in this docket.

Respectfully submitted,

**Liberty Cablevision of Puerto Rico, Ltd.**

**By:**

A handwritten signature in dark ink, appearing to read 'N. Paolini-Subramanya', with a long horizontal stroke extending to the right.

Nicole E. Paolini-Subramanya  
Cinnamon Mueller  
307 N. Michigan Avenue  
Suite 1020  
Chicago, Illinois 60601

(312) 372-3930

Attorneys for Liberty Cablevision of  
Puerto Rico, Ltd.

## EXHIBIT 1

The FCC Acknowledges Receipt of Comments From ...

## Liberty Cablevision of Puerto Rico, Ltd.

...and Thank You for Your Comments

Your Confirmation Number is: '200591166034'	
Date Received:	Sep 1 2005
Docket:	05-196
Number of Files Transmitted:	1
DISCLOSURE	
<p>This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus or automated links to source documents that is not included with your filing.</p> <p>Filers are encouraged to retrieve and view their filing within 24 hours of receipt of this confirmation. For any problems contact the Help Desk at 202-418-0193.</p>	